



**Environmental
Operations, Inc.**
CLEARING THE WAY

RECEIVED

APR 18 2013

AWMD/WRAP-KNRP

April 15, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

RE: Monthly Progress Report
Solutia – John F. Queeny Plant
St. Louis, Missouri
EPA ID No. MOD 004 954 111

RCRA



526515

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

March 1, 2013 – March 31, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI submitted to EPA the revised Baseline Groundwater Monitoring Report dated March 27, 2013. The revised report addressed comments received from EPA and the Missouri Department of Natural Resources.
- EOI completed review of the quarterly groundwater data received from the laboratory for the sampling initiated in late January and completed in February 2013. The results are attached.
- EOI initiated the quarterly sampling event on March 27, 2013.
- EOI deferred delineation in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million (ppm) while developing plans for additional removal of soil in that area identified during initial delineation as having greater than 100 ppm PCBs.

Estimate of the percentage of the project completed during the reporting period

- 2%

Environmental Consulting & Remediation, Demolition, & Geotechnical Engineering
1530 South Second Street • Saint Louis, Missouri 63104-4500 • 314-241-0900

www.environmentalops.com

 Printed On Recycled Paper

Mr. Bruce Morrison
April 15, 2013

Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- Not applicable.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

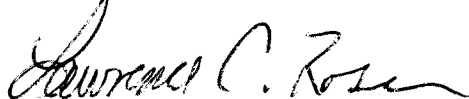
- The attached CD contains the groundwater data reports for the sampling event completed in February 2013. If paper copies are needed, please advise.

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will resume delineation in the VV Area for PCB concentrations less than 100 and greater than 10 ppm, and perform removal and disposal of any additional PCB-containing soil with concentrations greater than 100 ppm. This work may begin in April.
- EOI will complete the quarterly groundwater sampling event in April.
- EOI will start review of any groundwater analytical results for the event in progress upon receipt from the laboratory
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen or Matt Robinson or who can be reached by phone at (314) 241-0900, or via email at larryr@environmentalops.com or matt@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.
Senior Project Manager

Attachment: CD containing Pace Analytical Laboratory Reports
60138104, 60138182, 60138203, 60138354, 60138572, and 60138699

Copy: Mr. Matt Robinson/EOI
Mr. Michael House/Solutia
Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR